34. The apparatus of 20, wherein said apparatus includes a means for dynamically adding said grammar to a speech recognizer.

35. (amended) An apparatus, comprising:

a speech user agent for accessing a browsing module for the world wide web, said speech user agent facilitating voice activation of said browsing module to access an information resource on the world wide web.

36. A method, comprising:

embedding voice activated control information in HTML pages as delivered on the World Wide Web, wherein said voice control information is encoded in a grammar language and is interpreted by a Web client user-agent that translates user utterances into client actions.

REMARKS

Applicants have amended the specification to include a cross reference to related application 08/419,229, per the Examiner's request.

Claims 20 and 35 have been amended to correct the misspelling of "brousing module", per the Examiner's request.

Claims 20-26, 29, 35, 35—36 stand rejected under 35 U.S.C. 102(e) as being anticipated by Houser et al. Applicants respectfully disagree.

In order that the rejection of any of Claims 20-26, 29, 35—36 is sustainable, it is fundamental that "each and every element as set forth in the claim be found, either expressly or inherently described, in a single prior art reference." Verdegall Bros. v. Unior Oil Co. of California, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). See also, Richardson v. Suzuki Motor Co., 9 USPQ2d 1913, 1920 (Fed. Cir. 1989), where the court states, "The identical invention must be shown in as complete detail

as is contained in the ... claim". Appellants respectfully submit that each and every element of Claims 20-26, 29, 35, 35—36 are not found, either expressly or inherently described in the Houser reference, as set forth below.

Independent Claim 20 requires and positively recites, an apparatus, comprising: "a speech user agent" and "**a browsing module for the world wide web being responsive to said speech user agent,** said speech user agent facilitating voice activation of **said browsing module to access an information resource on the world wide web**".

Independent Claim 35 requires and positively recites, an apparatus, comprising: "a speech user agent for accessing **a browsing module for the world wide web,** said speech user agent facilitating voice activation of **said browsing module to access an information resource on the world wide web**".

Independent Claim 36 requires and positively recites, a method, comprising: "**embedding voice activated control information in HTML pages as delivered on the World Wide Web,** wherein said voice control information is **encoded in a grammar language** and is **interpreted by a Web client user-agent that translates user utterances into client actions**".

In contrast, the Houser reference discloses: "a system for controlling a device such as a television and for controlling access to broadcast information such as video, audio, and/or text information ... in which ... **a processor** executes a speech algorithm using the received vocabulary data to recognize the utterances of the speaker AND for controlling the device **AND the access to the broadcast information in accordance with the recognized utterances of the speaker**", (Abstract, lines 1-3 and 6-11). Houser goes on to state: "information request processor 156 may also access a communication network 158 in order to provide subscriber access to services such as the Internet" (col. 11, lines 47-50). But where is the "browser" in Houser?

Applicants respectfully point out that Houser fails to teach or suggest anything relating to a "browser", a "browsing module for the Internet" and/or that such "browsing module" can be voice

activated by the speech user agent. Accordingly, Houser fails to teach or suggest, a "**browsing module for the Internet or the World Wide Web (WWW) being responsive to said speech user agent,** said speech user agent **facilitating voice activation of said browsing module to access an information resource on the Internet**", as required by Claim 20, or "a speech user agent for accessing **a browsing module for the world wide web,** said speech user agent facilitating voice activation of **said browsing module to access an information resource on the world wide web**", as required by Claim 35, or "**embedding voice activated control information in HTML pages as delivered on the World Wide Web,** wherein said voice control information is **encoded in a grammar language** anu is **interpreted by a Web client user-agent that translates user utterances into client actions**", as required by Claim 36. The 35 U.S.C. 102(e) rejection of Claims 20, 35 and 36 is overcome.

Claims 21-26 and 29 stand allowable as depending from allowable claims and including further limitations not taught or suggested by the references of record.

Claim 21 further defines the apparatus of Claim 20, wherein said access of said information resource is accomplished in part through use of a grammar embedded in said information resource. The Houser reference fails to teach this further limitation in combination with the other requirements of Claim 20.

Claim 22 further defines the apparatus of Claim 21, further including a means for processing the verbal directions of a user based on said grammar. The Houser reference fails to teach this further limitation in combination with the other requirements of Claim 21.

Claim 23 further defines the apparatus of Claim 22, further including a means for returning a result of said verbal directions to said user. The Houser reference fails to teach this further limitation in combination with the other requirements of Claim 22.

Claim 24 further defines the apparatus of Claim 21, wherein said information resource is an HTML page. The Houser reference fails to teach this further limitation in combination with the other requirements of Claim 21.

Claim 25 further defines the apparatus of Claim 20, further including an instructional module for communicating allowed actions by a user. The Houser reference fails to teach this further limitation in combination with the other requirements of Claim 20.

Claim 26 further defines the apparatus of Claim 21, wherein said embedded grammar is a smart page grammar. The Houser reference fails to teach this further limitation in combination with the other requirements of Claim 21.

Claim 29 further defines the apparatus of Claim 22, wherein said actions come from a speech recognizer. The Houser reference fails to teach this further limitation in combination with the other requirements of Claim 22.

Claim 28, 30-34 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Houser as applied to claim 21 above, and further in view of Arons. Applicants respectfully disagree, as set forth below.

Claim 28 further defines the apparatus of Claim 21, wherein said grammar is dynamically added to a speech recognizer.

Claim 30 further defines the apparatus of Claim 20, further including a means for extracting a grammar from a hypermedia source on said information resource for future reference to said source.

Claim 31 further defines the apparatus of Claim 31, further including a means for automatically producing an intelligent grammar from said information resource.

Claim 32 further defines the apparatus of Claim 32, further including a means for processing said grammar to produce a reference to said hypermedia source.

Claim 33 further defines the apparatus of Claim 20, wherein said apparatus further includes a means for tokenizing a title for addition into said grammar.

Claim 34 further defines the apparatus of 20, wherein said apparatus includes a means for dynamically adding said grammar to a speech recognizer.

As stated previously, the Houser reference discloses: "a system for controlling a device such as a television and for controlling access to broadcast information such as video, audio, and/or text information ... in which ... **a processor** executes a speech algorithm using the received vocabulary data to recognize the utterances of the speaker AND for controlling the device **AND the access to the broadcast information in accordance with the recognized utterances of the speaker**", (Abstract, lines 1-3 and 6-11). Houser goes on to state: "information request processor 156 may also access a communication network 158 in order to provide subscriber access to services such as the Internet" (col. 11, lines 47-50). But where is the "browser" in Houser?

Applicants respectfully point out that Houser fails to teach or suggest anything relating to a "browser", a "browsing module for the Internet" and/or that such "browsing module" can be voice activated by the speech user agent. Accordingly, Houser fails to teach or suggest, a "**browsing module for the Internet or the World Wide Web (WWW) being responsive to said speech user agent**, said speech user agent **facilitating voice activation of said browsing module to access an information resource on the Internet**", as required by Claim 20, or "a speech user agent for accessing **a browsing module for the world wide web**, said speech user agent facilitating voice activation of **said browsing module to access an information resource on the world wide web**", as required by Claim 35, or "**embedding voice activated control information in HTML pages as delivered on the World Wide Web**, wherein said voice control information is **encoded in a grammar language** and **is interpreted by a Web client user-agent that translates user utterances into client actions**", as required by Claim 36.

Even assuming, arguendo, that Arons were to teach "dynamically adding grammar to a speech recognizer, extracting a grammar from a hyper media source, automatically producing an intelligent grammar from said information source, processing said grammar to produce a reference to said hypermedia source, and tokenizing a title for addition into said grammar", as suggested by the Examiner (col. 5, lines 9-14, Office Action dated September 13, 2001), Arons fails to teach or suggest the above described deficiencies of the Houser reference. Accordingly, Claims 28, and 30-34 stand allowable as depending from allowable claims and including further limitations not taught or suggested by the references of record.

Claims 20-36 stand allowable. Applicant respectfully requests withdrawal of all pending rejections and allowance of the application as the earliest possible date.

Respectfully submitted,

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